

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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JOHN J. VAUGHN, GERALD A.
KALBFLEISCH, MICHAEL HATHAWAY :
and MYRTLE HATHAWAY :
:
Plaintiffs, :
:
v. : Civil Action
: No. 04-10988-GAO
:
PUTNAM INVESTMENT MANAGEMENT,
LLC and PUTNAM RETAIL :
MANAGEMENT LIMITED PARTNERSHIP :
:
Defendants.
----- X

**ASSENTED-TO MOTION TO WITHDRAW
MOTION FOR A PROTECTIVE ORDER AS TO THE
DEPOSITION OF PUTNAM PRESIDENT AND CEO CHARLES
HALDEMAN (DOCKET 122) UPON STIPULATION OF THE PARTIES**

On an assented-to basis, Defendant Putnam Investment Management, LLC,
Defendant Putnam Retail Management Limited Partnership, and Putnam President and CEO
Charles Haldeman, respectfully request that the Court allow the withdrawal of their Motion For
A Protective Order As To The Deposition Of Putnam President And CEO Charles Haldeman
(the "Motion") (filed on March 27, 2007, Docket 122). Defendants and Mr. Haldeman have
reached agreement with the Plaintiffs to withdraw the Motion upon the following stipulation:

1. Pursuant to Fed. R. Civ. P. 30(d)(2), any deposition of Mr. Haldeman is
limited to three and one-half hours during the course of one day, and that deposition will take
place in the offices of Skadden, Arps, Slate, Meagher & Flom LLP, One Beacon Street, Boston,
MA 02108, at a mutually agreeable date and time to be determined by the parties; and

2. Plaintiffs hereby commit that they will not seek additional deposition time with Mr. Haldeman in connection with or on the basis of future productions of documents made by Defendants or any third-party.

WHEREFORE, on the foregoing basis and in light of the herein-described stipulation of the parties, Defendants and Mr. Haldeman respectfully request that this Court permit withdrawal of the Motion (filed on March 27, 2007, Docket 122).

Dated: May 25, 2007
Boston, Massachusetts

Respectfully submitted,

Stipulated and Assented To:

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Putnam President and CEO Charles Haldeman

Certificate Of Service

I, Scott T. Lashway, hereby certify that on May 25, 2007, this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on May 25, 2007.

Dated: May 25, 2007

/s/ Scott T. Lashway
Scott T. Lashway